

UNITED STATES BANKRUPTCY COURT
Northern District of California

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, a
California corporation sole

Bankruptcy No.: 23-40523 WJL
R.S. No.:
Hearing Date: 07/16/2025
Time: 1:00 pm

Debtor(s)

Relief From Stay Cover Sheet

Instructions: Complete caption and Section A for all motions. Complete Section B for mobile homes, motor vehicles, and personal property. Complete Section C for real property. Utilize Section C as necessary. If moving party is not a secured creditor, briefly summarize the nature of the motion in Section D.

(A) Date Petition Filed: 05/08/2023 Chapter: 11
Prior hearings on this obligation: 01/08/2025 Last Day to File §523/§727 Complaints: _____

(B) Description of personal property collateral (e.g. 1983 Ford Taurus):

Secured Creditor ☐ or lessor ☐

Fair market value: \$ _____

Source of value: _____

Contract Balance: \$ _____

Pre-Petition Default: \$ _____

Monthly Payment: \$ _____

No. of months: _____

Insurance Advance: \$ _____

Post-Petition Default: \$ _____

No. of months: _____

(C) Description of real property collateral (e.g. Single family residence, Oakland, CA):

Fair market value: \$ _____

Source of value: _____

If appraisal, date: _____

Moving Party's position (first trust deed, second, abstract, etc.):

Approx. Bal. \$ _____

Pre-Petition Default: \$ _____

As of (date): _____

No. of months: _____

Mo. payment: \$ _____

Post-Petition Default: \$ _____

Notice of Default (date): _____

No. of months: _____

Notice of Trustee's Sale: _____


Advances Senior Liens: \$ _____

Specify name and status of other liens and encumbrances, if known (e.g. trust deeds, tax liens, etc.):

Position	Amount	Mo. Payment	Defaults
1 st Trust Deed: _____	\$ _____	\$ _____	\$ _____
2 nd Trust Deed: _____	\$ _____	\$ _____	\$ _____
_____:			
_____:			
_____:			
(Total)	\$ _____	\$ _____	\$ _____

(D) Other pertinent information:

Dated: 06/25/2025



Signature
Gabrielle L. Albert

Print or Type Name

Attorney for Official Committee of Unsecured Creditors

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**RENEWED MOTION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO LIFT
THE AUTOMATIC STAY TO PERMIT
CERTAIN PLAINTIFFS' PERSONAL
INJURY CLAIMS TO PROCEED IN
STATE COURT**

Judge: Hon. William J. Lafferty

Date: July 16, 2025

Time: 1:00 pm (Pacific Time)

Place: United States Bankruptcy Court
1300 Clay Street, Courtroom 220
Oakland, CA 94612

1 The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman
2 Catholic Bishop of Oakland (the “**Debtor**” or the “**Diocese**”) files this renewed motion (this
3 “**Motion**”), under section 362(d) of title 11 of the United States Code, for entry of an order,
4 substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), granting relief
5 from the automatic stay and authorizing the Superior Court of the State of California, County of
6 Alameda (the “**State Court**”) overseeing the “Northern California Clergy Cases,” being
7 administered under Judicial Council Coordination Proceeding (JCCP 5108) (the “**Coordinated**
8 **Proceedings**”), to release six cases (the selected cases are defined as the “**State Court Actions**”)
9 commenced by survivors of sexual abuse (“**Survivors**”) against the Debtor for trial by jury, *solely*
10 *for purposes of liquidation, not collection against the Debtor*, in accordance with the orders issued,
11 and procedures used, by the State Court before this chapter 11 case (the “**Chapter 11 Case**”) was
12 filed.¹ In support of this Motion, the Committee states:²

13 I.

14 **THE COURT SHOULD MODIFY THE AUTOMATIC STAY**
15 **GIVEN THE CHANGE IN CIRCUMSTANCES**

16 In late November 2024, the Committee filed the First Lift Stay Motion, requesting that the
17 Court modify the automatic stay to allow six State Court Actions to proceed to trial. The
18 Committee sought this relief to prod mediation, which had stalled. Historically, without the
19 pressure of impending trials, diocesan bankruptcy mediations move slowly or fail altogether, as
20 occurred here.

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24 ¹ Because the parties have not agreed to modify or terminate the automatic stay, this paragraph constitutes the
concise statement of the relief requested required by Bankruptcy Rule 4001(d)(1)(B).

25 ² On November 20, 2024, the Committee filed the *Motion of the Official Comm. of Unsecured Creditors to*
26 *Lift the Automatic Stay to Permit Certain Plaintiffs’ Pers. Inj. Claims to Proceed in State Ct.* [Dkt. No. 1460]
(the “**First Lift Stay Motion**”). The First Lift Stay Motion is attached as **Exhibit 1** to the *Declaration of*
27 *Gabrielle Albert in Support of Renewed Motion of the Official Committee of Unsecured Creditors to Lift the*
28 *Automatic Stay to Permit Certain Plaintiffs’ Personal Injury Claims to Proceed in State Court* (the “**Albert**
Dec.”) filed contemporaneously herewith. The First Lift Stay Motion is hereby incorporated by reference as
if fully set forth herein. The authorities cited therein serve as the legal basis for this Motion. All capitalized
terms not defined in this Motion are defined in the First Lift Stay Motion.

1 The Court denied the First Lift Stay Motion without prejudice after expressing concerns
2 about the pace with which the State Court Actions might move through the State Court.³ But the
3 Court stated in its oral ruling that denial of the First Lift Stay Motion was “very much without
4 prejudice because things may change, and it may be that it’s something that will be very helpful
5 in the future.”⁴ Indeed, in denying the Committee’s motion for standing to continue prosecuting
6 the Debtor’s adversary proceeding against the Insurers the prior week, the Court made a similar
7 observation, stating that:

8 As I’ve said in [an]other context, time is a long thing. And if we
9 end up in a situation where I am convinced, either by legal
10 arguments or by the vote of constituents, that the plan the debtor
11 proposes cannot be confirmed, we’ll be in a different place. And at
12 that point, it will be -- there will be nothing wrong with
reconsidering whether, as part of that scenario, the better course is
to allow the committee to be more of a protagonist here than
they are right now.⁵

13 *The vote has concluded. Things have changed. And this case is in a dramatically*
14 *different place. Given the sea change, stay relief will be helpful, if not vital, to resolving this*
15 *case consensually.*

16 *First*, 341 out of 343 Survivors—**99.4%**—voted to reject the *Debtor’s Third Amended Plan*
17 *of Reorganization* [Dkt. No. 1830] (the “**Plan**”).⁶ The near-complete lopsidedness of the Survivor
18 vote is unprecedented. Only two other Roman Catholic Dioceses have attempted to cramdown
19 chapter 11 plans of reorganization on survivors of sexual abuse. In those cases, survivors voted to
20 reject the debtors’ plans of reorganization by 86% and 93%.⁷

21 _____
22 ³ See *Order on Motion of the Official Comm. of Unsecured Creditors to Lift the Automatic Stay to Permit*
23 *Certain Plaintiffs’ Pers. Inj. Claims to Proceed in State Ct.* [Dkt. No. 1721] (denying the First Lift Stay
24 Motion without prejudice for the reasons set forth in the Court’s oral ruling discussed herein).

25 ⁴ Jan. 21, 2025 Hr’g Tr. at 17:22–24 [Dkt. No. 1667] (“**RCBO 1/21/25 Hr’g Tr.**”). The *RCBO 1/21/25 Hr’g*
26 *Tr.* is attached as **Exhibit 2** to the Albert Dec.

27 ⁵ Jan. 15, 2025 Hr’g Tr. at 18:6–13 [Dkt. No. 1645] (“**RCBO 1/15/25 Hr’g Tr.**”). The *RCBO 1/15/25 Hr’g*
28 *Tr.* is attached as **Exhibit 3** to the Albert Dec.

⁶ See *Declaration of Andres A. Estrada with Respect to Solicitation and the Tabulation of Votes on the Debtor’s*
Third Amended Plan of Reorganization [Dkt. No. 2040] (the “**Vote Tabulation Declaration**”).

⁷ In *In re The Archdiocese of St. Paul & Minneapolis*, more than 93% of abuse claimants rejected the
Archdiocese’s plan when it was opposed by the committee. See *Rep. of Ballot Tabulation*, No. 15-30125
(Bankr. D. Minn. May. 11, 2017), Dkt. No. 1041. In *In re The Roman Catholic Diocese of Rockville Centre*,

1 Although the Debtor mulishly persists in its effort to cramdown the Plan on Survivors, the
2 Debtor faces considerable challenges before its Plan may be confirmed. To name but a few:

- 3 • As set forth in the Committee’s previous objections to the Disclosure Statement,
4 the Debtor manufactures an impaired accepting class of creditors—Class 3
(General Unsecured Creditors)—to avail itself of cramdown.

5 A review of the Vote Tabulation Declaration indicates that a number of Class 3
6 General Unsecured Creditors voting for the Plan are insiders—including the Bishop
7 voting a \$300 claim on account of an unreimbursed expense—or are claims being
asserted by Parish Churches, which have no separate legal existence from the
Debtor and cannot hold claims or vote on the Plan.

- 8 • As set forth in the Committee’s previous objections to the Disclosure Statement,
9 the Debtor fails to value Survivor claims to determine the actual percentage
10 recovery Survivors will receive under the Plan. Rather, the Debtor seeks to
11 establish the fairness of its payment to Survivors by comparing it to distributions
12 made to *other* survivors in *other* bankruptcy cases pending in *other* jurisdictions in
cases with *different* governing law, *different* estate assets, *different* insurance
13 programs and *different* historical jury verdicts and settlements.⁸ The Debtor also
14 fails to factor into its analysis whether the statute of limitations was open in prior
15 cases, which is a material factor in determining claim values.

- 16 • As set forth in the Committee’s previous objections to the Disclosure Statement,
17 the Debtor unilaterally declares that hundreds of millions of dollars of its assets,
18 including the vast majority of its real estate holdings, are “mission critical” and
should not be included in the hypothetical liquidation test.

- 19 • As alleged in the Committee’s “Restricted Assets” complaint (Adv. Pro. No. 24-
20 04051 WJL), the Debtor disregards \$38 million in cash and investments that could
21 be used to either pay Survivors directly or to satisfy future expenses—thereby
22 freeing up unrestricted cash to pay Survivors—claiming these donations are
“restricted.”

23 **Second**, the State Court recently stated that it has “significant latitude” to schedule the
24 State Court Actions and could do so “*expeditiously*.”⁹ Indeed, California law explicitly empowers

25 approximately 86% of abuse claimants voted to reject the diocese’s plan. *See Declaration of Stephanie*
26 *Kjontvedt of Epiq Corporate Restructuring, LLC Regarding the Solicitation and Tabulation of Ballots Cast*
27 *on Fourth Modified First Amended Chapter 11 Plan*, No. 20-12345-mg (Bankr. S.D.N.Y. Apr. 17, 2024),
Dkt. No. 3057.

28 ⁸ Under applicable non-bankruptcy law, jury verdicts and individual case settlements are the proper mechanism
to liquidate the value of Survivors’ claims. Congress has expressly preserved claimants’ jury-trial rights for
personal-injury claims such as the sexual abuse actions in this case. *See* 28 U.S.C. § 157(b). Payment of
claims against a bankrupt debtor may be limited by the debtor’s resources, but the allowed amount of such
claims is not. *See* 11 U.S.C. § 502(b)(1) (claims are allowed “except to the extent . . . unenforceable . . .
under . . . applicable law”).

⁹ May 28, 2025 Hr’g Tr. at 28:16–18, *In re N. Calif. Clergy Cases*, No. JCCP5108 (Cal. Super. Ct.) (“**State
Court Hr’g Tr.**”) (emphasis added). The State Court Hr’g Tr. is attached as **Exhibit 4** to the Albert Dec.

1 coordination judges to schedule trials to “expedite the just determination of the coordinated
2 actions” and “serve the ends of justice.”¹⁰

3 California’s official manual on complex cases states, “[t]he court should manage the
4 selection of bellwether cases to maximize the impact of the bellwether trials on future settlements.
5 . . . By participating in the process, the judge can . . . guide the parties to a selection of cases that
6 are typical and yield predictive results.”¹¹ The State Court thus previously entered an *Order on*
7 *Criteria for Bellwether Cases* stating, in part, that the State Court was “inclined to select cases for
8 bellwether trials based on whether they will present legal or factual issues that are present in many
9 of [the] cases or that will otherwise provide information that will permit the parties to evaluate the
10 value of other cases.”¹²

11 The Court also expressed concern in its ruling on the First Lift Stay Motion that there was
12 a newly appointed State Court Coordination Trial Judge.¹³ Now, The Honorable Somnath Raj
13 Chatterjee (the “**Coordination Judge**”) has been overseeing the Coordinated Proceedings for
14 close to six months and nothing suggests that there will be any change in Coordination Judges
15 anytime soon.

16 **Third**, bankruptcy courts overseeing nonprofit sexual abuse cases across the country have
17 recently granted stay relief to jumpstart stalled mediation. Stay relief, according to the courts, is:

- 18 • a way for the parties to “better appreciate their risks and the benefits of a consensual
19 plan”;¹⁴
- 20 • a means to “move the entire case toward, and not away from, a global resolution”;¹⁵
21 and

22 ¹⁰ Cal. R. Ct. § 3.541(b).

23 ¹¹ 1 California Deskbook on Complex Civil Litigation § 4.04 (2025); *see also id.* § 5.68 (“Mass tort litigation
primarily is resolved by settlement based upon the results of bellwether trials.”).

24 ¹² *Order on Criteria for Bellwether Cases* at 1, In re N. Calif. Clergy Cases, No. JCCP5108 (Cal. Super. Ct.
Nov. 18, 2022). The Order is attached as **Exhibit 5** to the Albert Dec.

25 ¹³ *RCBO 1/21/25 Hr’g Tr.* at 17:9–18 (“I’m also somewhat concerned about the fact that there’s a new presiding
26 judge with respect to these matters and that that person has yet to have a hearing with respect to the
consolidated matter.”).

27 ¹⁴ *In re Diocese of Buffalo, N.Y.*, 665 B.R. 198, 202 (Bankr. W.D.N.Y. 2024).

28 ¹⁵ *Memorandum Decision on Motion for Relief from Stay, In re Roman Cath. Archbishop of S.F.* at 6, No. 23-
30564-DM (Bankr. N.D. Cal. Apr. 10, 2025), Dkt. No. 1138 (“**S.F. Stay Relief Order**”). The *S.F.* Stay
Relief Order is attached as **Exhibit 6** to the Albert Dec.

1 • a needed “different approach” amid parties’ failure to settle.¹⁶
2 In the face of ineffective mediation, bankruptcy courts are increasingly concluding it is time to try
3 something new.¹⁷

4 In three pending Roman Catholic Diocese bankruptcy cases (plus the *Franciscan Friars*
5 case), courts have recently granted stay relief to survivors, concluding that resuming sex-abuse
6 litigation was necessary to spur consensual resolution. First, in December, the court in *Diocese of*
7 *Buffalo* lifted the stay to allow survivors to try their cases in state court.¹⁸ “Litigated disputes,”
8 the court explained, “are often settled on the courthouse steps. By pushing litigants closer to a trial
9 of tort claims, we hope that the parties may better appreciate their risks and the benefits of a
10 consensual plan.”¹⁹ Next, the court overseeing the Diocese of Albany’s bankruptcy case granted
11 seven stay relief motions, reasoning that “with each passing day, the lack of settlement suggests
12 the need to take a different approach.”²⁰ Third, in the most recent decision, the *Archdiocese of San*
13 *Francisco* bankruptcy court granted stay relief for two survivors, reasoning that “more good than
14 harm will be achieved, more progress forward than retreat backward or status quo will be the
15 case.”²¹ The court added: “[b]oth the [committee’s] citations to other bankruptcies that have
16 progressed after relief from stay has been lifted (and others that have languished where no stay
17 relief was granted) and the court’s own experience l[e]d the court to this decision.”²²

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20 ¹⁶ March 12, 2025 Hr’g Tr. at 10:15, *In re Roman Cath. Diocese of Albany, N.Y.*, No. 23-10244 c (“*Albany Hr’g Tr.*”). The *Albany Hr’g Tr.* is attached as Exhibit 7 to the Albert Dec.

21 ¹⁷ As the Court knows, stay relief was granted, with the consent of the debtor, in the *Franciscan Friars*
22 bankruptcy case. While the Court noted that the situation in *Franciscan Friars* was “unique” because of the
23 debtor’s agreement to seek a modification of the stay, the Court’s discussion and analysis of the purpose of
24 the automatic stay as a “tool” is equally applicable here. See Apr. 1, 2025 Hr’g Tr. at 92:24–93:7, 93:15–
25 94:2, *In re Franciscan Friars of Cal., Inc.*, No. 23-41723 (Bankr. N.D. Cal.), Dkt. No. 876 (“*Franciscan*
Friars Hr’g Tr.”). In *Franciscan Friars*, modifying the automatic stay was intended to advance mediation.
Id. at 94:13–16. Here too, the Committee seeks to modify the automatic stay to jumpstart a stalled mediation
to drive this case to a successful conclusion. The *Franciscan Friars Hr’g Tr.* is attached as Exhibit 8 to the
Albert Dec.

26 ¹⁸ See 665 B.R. at 205.

27 ¹⁹ *Id.* at 202.

28 ²⁰ *Albany Hr’g Tr.* at 10:13–15 (quoting *In re Diocese of Buffalo*, 665 B.R. at 202).

²¹ *S.F. Stay Relief Order* at 8.

²² *Id.* at 8–9.

1 Despite just how much things have changed, the Debtor and the Insurers will oppose this
2 Motion, likely arguing that the status quo should remain pending the Plan confirmation trial.
3 Ironically, the imminence of the Plan confirmation trial reinforces the need for the requested relief
4 because allowing the State Court Actions to proceed is appropriate whether or not the Plan is
5 confirmed. If the Plan is confirmed, Survivors electing the “Litigation Option” may continue
6 prosecuting their cases in State Court for purposes of insurance recovery.²³ Lifting the automatic
7 stay as requested herein merely expedites the Litigation Option contemplated by the Plan. If this
8 Motion is granted, the Insurers will be asked to defend the Debtor now, just as they must if the
9 Plan is confirmed. In either case, none of the Insurers’ rights, claims, or defenses are modified in
10 any way.

11 If the Court denies confirmation, the stasis the Committee long feared will follow. Earlier,
12 the Debtor mocked the Committee for proposing an alternative to a contested plan confirmation,
13 which focused on resolving two key issues: the value of Survivors’ claims and the size of the
14 Debtor’s estate, all while saving the extraordinary costs of a contested plan confirmation hearing
15 that the Debtor now complains of. The Committee’s proposal stemmed from concern that if the
16 Debtor’s Plan was denied, no progress would be made on these issues. The Committee urged the
17 Debtor to join a process allowing (i) an Alameda County jury to determine the value of certain
18 Survivor claims, settling the dispute over their value, and (ii) the Court to decide the size and scope
19 of the Debtor’s bankruptcy estate. The Debtor refused, insisting on confirming its Plan with or
20 without Survivor support. Previously, the Debtor could claim it did not need to prove the Plan
21 could be crammed down on Survivors until after the vote. That argument is now moot: the
22 conjecture that allowed the Debtor to get here has been put to rest.²⁴

23 ²³ See Plan § 9.8.4.

24 ²⁴ See Dec. 18, 2024 Hr’g Tr. at 98:18–25, *In re The Roman Cath. Bishop of Oakland*, No. 23-40523 (Bankr. N.D. Cal.), Dkt. No. 1568 (“RCBO 12/18/24 Hr’g Tr.”) (Debtor’s counsel: “So on the issue of whether the plan is patently unconfirmable, it is not patently unconfirmable because it is possible -- it is not impossible - - that all four of those impaired classes could vote to support the plan. The committee is going to swear up and down, and they have sworn up and down, there’s no way class 4 is going to support the plan. But they don’t know that. I don’t know that. You don’t know that.”). The RCBO 12/18/24 Hr’g Tr. is attached as Exhibit 9 to the Albert Dec.

1 If this Court holds that it cannot, and will not, be the first Bankruptcy Court in the country
2 to cramdown a plan of reorganization on Survivors, the parties stand on the precipice of having
3 failed to resolve their fundamental disputes. Expediting a resolution is thus more important than
4 ever. Survivors experience continuing trauma and evidence erodes while this Chapter 11 Case
5 remains stagnant. And Survivors who pass away—at least ten Survivors have passed away—are
6 permanently denied justice and lose the chance to corroborate their claims with testimony that is
7 exclusively within their personal knowledge.

8 To course correct, the Committee files this Motion to begin the process needed to bring
9 this case to a consensual resolution: exposing all parties, including the Insurers, to risk of loss, or
10 guidance as to what a jury in Alameda County might award a Survivor. Indeed, this Court
11 previously acknowledged that lifting the stay could have that very effect.²⁵ And while the Court
12 expressed concern earlier in this case that the State Court Actions may not promptly move to trial,
13 the Coordination Judge has since stated that the State Court Actions can move to trial
14 expeditiously.²⁶ In fact, at least one of the six State Court Actions will likely be the case of
15 Survivor Steve Woodall, whose bellwether case against the Debtor was set for trial on May 1,
16 2023.²⁷

17 Substantially all discovery in Mr. Woodall's case is complete except the Debtor's mental
18 health examination of Mr. Woodall. That examination may commence immediately after the
19 automatic stay is lifted and any other discovery, to the extent any remains, can be completed in a
20 few weeks' time while the Coordination Judge arranges his schedule to conduct a trial. No
21 summary judgment motion will be brought, and the remaining motions are limited to motions in
22

23 ²⁵ See *RCBO* 1/21/25 Hr'g Tr. at 16:20–17:1–2 (“I thought an awful lot of good could come from getting some
24 real data on the claims. And frankly, I don't mean to be flip here, but also from creating in everybody's mind
25 the possibility that you're going to hear something in those determinations that you don't like, which I think
has been and an incentive to move cases along more quickly than perhaps they were proceeding without that
incentive.”).

26 ²⁶ State Court Hr'g Tr. at 28:16–18 (“[I]f the question is, when can this Court set it for trial . . . [w]e could set
it for trial pretty expeditiously”).

27 ²⁷ Mr. Woodall is the Chairperson of the Committee. The Insurers will undoubtedly argue that there is
28 favoritism in, and a conflict of interest by, even suggesting that this case go forward to which the response is
two-fold: first, it is up to the State Court to ultimately choose which State Court Actions proceed and second,
it was the Debtor which chose the Woodall case as the first bellwether trial.

1 limine to be heard before trial. The Woodall case will be ready for trial in 90 days or less,
2 depending on the Coordination Judge's calendar.

3 To help the parties gain clarity on the value of Survivor claims, to unlock the liability
4 insurance assets, and to set this case on a path towards resolution, the Committee requests that this
5 Court lift the automatic stay so that six cases pending against the Diocese may proceed to trial by
6 jury, *solely for purposes of liquidation and not collection against the Debtor*.²⁸

7 **II.**

8 **NOTICE**

9 Notice of this Motion will be provided to (i) the Debtor; (ii) the Insurers; (iii) the United
10 States Trustee and (iv) those persons who have formally appeared in this Chapter 11 Case and
11 requested service under Bankruptcy Rule 2002. Based on the nature of the requested relief, the
12 Committee submits that no further notice is required.

13 **WHEREFORE**, the Committee requests entry of the Proposed Order and any other relief
14 that the Court may deem just and appropriate.

15 Dated: June 25, 2025

**LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP
BURNS BAIR LLP**

17 By: /s/ Gabrielle L. Albert

18 Tobias S. Keller
19 Gabrielle L. Albert

20 -and-

21 Jeffrey D. Prol
22 Brent Weisenberg

23 *Counsel for the Official Committee of
Unsecured Creditors*

24 -and-

25 Timothy W. Burns
26 Jesse J. Bair

27 *Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

28 ²⁸ Given the Debtor's recent concerns about its diminishing liquidity, the Committee reserves the right to seek dismissal of this case if the Plan is not confirmed. *See Debtor's Motion to Amend Ord. Establishing Procs. for Interim Comp. and Reimbursement of Expenses of Pros.* [Dkt. No. 1908].